

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SHAMARLA TAYLOR,

Plaintiff,

v.

EQUIFAX,

Defendant.

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Case No.

NOTICE OF REMOVAL

Defendant, Equifax Information Services LLC (“Equifax”), by Counsel, and hereby file this Notice of Removal of this action from the Justice of the Peace Court of the State of Delaware in and for New Castle County, Court No. 13, wherein it is now pending as Case No. JP13-17-007557, to the United States District Court for the District of Delaware. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441 and 1446. In support hereof, Defendants show this Court as follows:

1. An action was filed on July 24, 2017 in the Justice of the Peace Court of the State of Delaware in and for New Castle County, Court No. 13, entitled *Taylor v. Equifax*, Case No. JP13-17-007557 (the “State Court Action”).

2. Equifax was served with the Complaint on July 31, 2017.

3. This Notice is being filed with this Court within thirty (30) days after Equifax was served with a copy of Plaintiff’s initial pleading setting forth the grounds for her action and her claims for relief.

4. This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or treaties of the United States;

specifically 15 U.S.C. § 1681 *et seq.*, otherwise known as the Fair Credit Reporting Act (“FCRA”), as follows:

(a) Plaintiff’s Complaint, on its face, alleges a violation of the FCRA. (See Plaintiff’s Complaint).

(b) The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action alleging a violation of its provisions “may be brought in any appropriate United States district court without regard to the amount in controversy . . .”

5. Promptly after the filing of this Notice of Removal, Equifax shall give written notice of the removal to Plaintiff and to the Clerk of the Justice of the Peace Court of the State of Delaware in and for New Castle County, Court No. 13, as required by 28 U.S.C. § 1446(d).

6. Attached hereto, as Exhibit A, are copies of the Summons and Complaint served upon Equifax in the State Court Action.

WHEREFORE, Equifax requests that the above-described action be removed to this Court.

Respectfully submitted this 14th day of August, 2017.

/s/ Karen M. Grivner
Karen M. Grivner (DE# 4372)
Clark Hill PLC
824 N. Market Street, Suite 710
Wilmington, DE 19801
Phone: 302.250.4749
Fax: 302.421.9439
Email: kgrivner@clarkhill.com
*Attorneys for Defendant Equifax Information
Services LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of August, 2017, I caused the Notice of Removal to be electronically filed with the Clerk of the Court using CM/ECF, and via U.S. Mail to:

Shamarla Taylor
2311 N. West St.
Wilmington, DE 19802

/s/ Karen M. Grivner
Karen M. Grivner (DE#4372)